

Exhibit A

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

R2 Solutions LLC,

Plaintiff,

v.

Databricks, Inc.,

Defendant.

Civil Action No. 4:23-cv-01147-ALM

Jury Trial Demanded

SCHEDULING ORDER

It is hereby **ORDERED**, after consultation with the parties, that the following scheduling will apply in this case:

Model Order Date	Proposed Date	Event
June 11, 2024 at 10:00 a.m.		Case Management Conference at Paul Brown United States Courthouse, 101 E. Pecan Street, Sherman, Texas. Counsel for each party, with authority to bind their respective clients, and all unrepresented parties, shall be present. Continuance of the management conference will not be allowed absent a showing of good cause.
June 21, 2024 [10 days after Mgmt. Conf.]		P.R. 3-1 Disclosure of Asserted Claims and Infringement Contentions (and P.R. 3-2 document production) to be served.
July 16, 2024 [5 weeks after Mgmt. Conf.]		Join Additional Parties.
TBD at Mgmt. Conf.		Mediation. The Court will discuss appointing a mediator at the Scheduling Conference.
July 16, 2024 [5 weeks after Mgmt. Conf.]		P.R. 3-3 Invalidity Contentions (and P.R. 3-4 document production) to be served. To extent not already required to be disclosed, exchange Mandatory Disclosures on all issues, including damages.
July 16, 2024 [5 weeks after Mgmt. Conf.]		Parties to exchange Initial Disclosures under FRCP 26(a).
July 26, 2024 [No later than 45 days after Mgmt. Conf.]		Parties to exchange proposed terms for construction and identify any claim element governed by 35 U.S.C. § 112, ¶ 6 (P.R. 4-1).

Model Order Date	Proposed Date	Event
July 30, 2024 [7 weeks after Mgmt. Conf.]		Privilege Logs to be exchanged by parties (or a letter to the Court stating that there are no disputes as to claims of privileged documents).
August 15, 2024 [No later than 65 days after Mgmt. Conf.]		Parties to exchange preliminary proposed claim construction and extrinsic evidence supporting same (P.R. 4-2).
September 10, 2024 [13 weeks after Mgmt. Conf.]		Parties' Final Amended Pleadings (a motion for leave is required).
September 13, 2024 [No later than 95 days after Mgmt. Conf.]		Joint Claim Construction and Prehearing Statement to be filed (P.R. 4-3). Provide an estimate of how many pages are needed to brief the disputed claims.
October 1, 2024 [16 weeks after Mgmt. Conf.]		Respond to Amended Pleadings.
October 14, 2024 [No later than 125 days after Mgmt. Conf.]		Completion date for discovery on claim construction (P.R. 4-4).
October 29, 2024 [No later than 140 days after Mgmt. Conf.]		Opening claim construction brief (P.R. 4-5(a)).

Model Order Date	Proposed Date	Event
November 4, 2024 [4 weeks before claim construction hearing]		Submit technology synopsis/tutorial (both hard and electronic copies).
November 12, 2024 [No later than 2 weeks after claim construction brief]		Responsive claim construction brief (P.R. 4-5(b)).
November 19, 2024 [No later than 7 days after response]		Reply claim construction brief (P.R. 4-5(c)).
November 22, 2024 [At least 10 days before claim construction hearing]		Parties to file joint claim construction and chart (P.R. 4-5(d)). Parties shall work together to agree on as many claim terms as possible.
	December 9, 2024	Deadline for substantial completion of document production.
December 2, 2024 at 1:30 p.m.	December 9, 2024 at 1:30 p.m.	Proposed Claim Construction Hearing at the Paul Brown United States Courthouse, 101 E. Pecan Street, Sherman, Texas 75090.
January 6, 2025		Deadline for Initial Mandatory Disclosure of all persons, documents, data compilations and tangible things, which are relevant to a claim or defense of any party and which has not previously been disclosed. This deadline is not an extension of earlier deadlines set out in this court's order or the Patent Rules, nor an excuse to delay disclosure of information. It is a "catchall" deadline for provision of all remaining information which may be relevant to a claim or defense of any party at trial.
	January 20, 2025	Fact Discovery Deadline and Deadline to File Motions to Compel related to Fact Discovery. All discovery must be served in time to be completed by this date.

Model Order Date	Proposed Date	Event
February 3, 2025 [9 weeks after claim construction hearing]	January 27, 2025	Parties with burden of proof to designate Expert Witnesses other than claims construction experts and provide their expert witness reports, to include for ALL experts all information set out in Rule 26(a)(2)(B).
February 3, 2025 [9 weeks after claim construction hearing]		Comply with P.R. 3-7 (Designation of Willfulness Opinions).
February 17, 2025 [11 weeks after claim construction hearing]		Parties to Designate Expert Witnesses on issues for which the parties do not bear the burden of proof, and provide their expert witness report, to include for ALL experts all information set out in Rule 26(2)(B). Note: Objections to any expert, including Daubert motions, shall be filed within 3 weeks after the expert's Report has been disclosed. Such objections and motions are limited to ten pages each.
March 3, 2025 [13 weeks after claim construction hearing]		Expert Discovery Deadline.
March 3, 2025 [13 weeks after claim construction hearing (no later than 110 days prior to the filing of the Joint Final PTO)]	March 13, 2025	File Dispositive Motions and any other motions that may require a hearing. Regardless of how many dispositive motions a party files, each party is limited to a total of sixty pages for such motions. Each individual motion shall comply with Local Rule CV-7. Responses to motions shall be due in accordance with Local Rule CV-7(e).
June 16, 2025 [5 weeks before final pretrial conference]		Notice of intent to offer certified records.

Model Order Date	Proposed Date	Event
June 16, 2025 [5 weeks before final pretrial conference]		<p>Counsel and unrepresented parties are each responsible for contacting opposing counsel and unrepresented parties to determine how they will prepare the Joint Final Pretrial Order</p> <p>(See www.txed.uscourts.gov) and Proposed Jury Instructions and Verdict Form (or Proposed Findings of Fact and Conclusions of Law in nonjury cases).</p>
June 23, 2025 [4 weeks before final pretrial conference]		<p>Serve Pretrial Disclosures (Witness List, Deposition Designations, Exhibit Lists, and Video Deposition Designation) by the Party with the Burden of Proof. Each party who proposes to offer a deposition shall serve on all other parties a disclosure identifying the line and page numbers to be offered. All other parties will have seven calendar days to serve a response with any objections and request cross- examination line and page numbers to be included. Counsel must consult on any objections, and only those which cannot be resolved shall be presented to the Court.</p> <p>The party who filed an initial Video Deposition Designation is responsible for preparation of the final edited video in accordance with all parties' designations, the applicable Federal Rules of Civil Procedure, and the Court's rulings on objections.</p>
	July 7, 2025	<p>Serve Objections to Pretrial Disclosures; and Serve Rebuttal Pretrial Disclosures.</p>
	July 14, 2023	<p>Serve Objections to Rebuttal Pretrial Disclosures.</p>
June 20, 2025 [30 days before final pretrial conference]		<p>Motions <i>in limine</i> due.</p> <p>File Joint Final Pretrial Order.</p> <p>Exchange Exhibits and deliver copies to the court. At this date all that is required to be submitted to the court is a hyperlinked exhibit list on disk (2 copies) and no hard copies.</p>

Model Order Date	Proposed Date	Event
July 7, 2025 [2 weeks before final pretrial conf]		<p>Responses to motions <i>in limine</i> due.</p> <p>File objections to witnesses, deposition extracts, and exhibits, listed in pre-trial order. (This does not extend the deadline to object to expert witnesses). If numerous objections are filed the court may set a hearing prior to the final pretrial conference.</p> <p>File Proposed Jury Instructions/Form of Verdict (or Proposed Findings of Fact and Conclusions of Law).</p> <p>If Parties will be requesting daily copy of the transcript during trial, they must notify the Court's court reporter, Chris Bickham, Chris_Bickham@txed.uscourts.gov, by this date.</p>
July 21, 2025 at 1:30 p.m.		Final Pretrial Conference at the Paul Brown United States Courthouse, 101 E. Pecan Street, Sherman, Texas 75090.
TBD – 10:00 a.m.		Jury Selection and Trial at the at the Paul Brown United States Courthouse, 101 E. Pecan Street, Sherman, Texas 75090.